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June 3, 2005

The Clerk and Administrative Services The Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0866

Dear Sir or Madam:

Enclosed please find for filing with the Commission original and fifteen (15) copies of Supra Telecommunications And Information Systems, Inc., Petition to Review BellSouth Promotional Tariffs.

Kindly return one copy marked "filed" in the enclosed self-addressed overnight envelop provided.

Thanks.

Sincerely

Brian Chaiken, Esq.

cc: Service List(via regular mail)

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FPSC-BUREAU OF RECORDS

05420 JUN-68

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Petition of Supra Telecommunications) and Information Systems, Inc. to Review)
BellSouth Promotional Tariffs.

Docket No. 050387 -TP

Filed: June 3, 2005

<u>PETITION OF SUPRA TELECOMMUNICATIONS AND INFORMATION</u> SYSTEMS, INC., TO REVIEW BELLSOUTH PROMOTIONAL TARIFFS

Supra Telecommunications and Information Systems, Inc. ("Supra") by and through its undersigned counsel and hereby files this petition with the Florida Public Service Commission ("Commission") pursuant to Florida Statutes §§364.01, 364.08, 365.051, 364.059 and 364.285, and requests that this Commission immediately review and suspend specific promotional tariff offerings that allow BellSouth Telecommunications Inc., ("BellSouth") to offer monetary inducements to customers (including cash back) that amount to several months of telephone service below cost, in violation of the Florida Statutes. Upon this Commission's review of BellSouth's tariffed offerings, Supra requests this Commission issue an order canceling BellSouth's offerings or requiring that BellSouth allow Supra to receive the same monetary inducements from BellSouth when Supra resells the identical service offerings which qualify for the promotional benefits, and for such other relief that the Commission deems appropriate. In support thereof, Supra states as follows:

1. Supra is a competitive local exchange carrier ("CLEC") certificated by the Commission to provide telecommunications services within the State of Florida. Petitioner's name, address and telephone number is as follows:

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Supra suggests that this Docket provides the Commission an opportunity to comply with Florida Statutes §364.059(2) and 364.3381(3) and thereby establish a rule adoption proceeding to create an objective benchmark,

Supra Telecommunications and Information Systems, Inc. 2901 S.W. 149th Avenue, Suite 300, Miramar, Florida 33027 (786) 455-4200

2. The Petitioner's representative's name, address and telephone number is:

Brian Chaiken, Esq.
Steven B. Chaiken, Esq.
Legal Department
Supra Telecommunications and Information Systems, Inc.
2901 S.W. 149th Avenue, Suite 300,
Miramar, Florida 33027
(786) 455-4248
(786) 455-4239
Facsimile: (786) 455-4600

3. BellSouth is a corporation organized and formed under the laws of the state of Georgia, with its principal office at 675 West Peachtree Street, Atlanta, Georgia, 30375. BellSouth is an Incumbent Local Exchange Carrier ("ILEC") certificated by this Commission to provide local exchange telecommunications services in the state of Florida. BellSouth's address in the State of Florida for service of process is:

Nancy B. White, General Counsel c/o Nancy H. Sims, Director of Regulatory Affairs BellSouth Telecommunications, Inc. 150 South Monroe Street, Suite 400 Tallahassee, Florida 32301

BACKGROUND

4. BellSouth is the dominant provider of local telecommunications service in the state of Florida. According to this Commission's December 2004 Annual Report on Competition, BellSouth's market share for local voice telephone service has risen to approximately 5.4 million

such as a price or cost floor, by which the Commission may determine whether a requested stay of a basic local

access lines (as proffered by BellSouth as of June 30, 2004). Even by conservative estimates, BellSouth is by far the single most dominant provider of local telephone service in the state of Florida.

- 5. BellSouth has abused its power as the dominant provider of telecommunications services by using monetary inducement promotional strategies and anticompetitive pricing programs to exclusively target customers that have switched to CLECs. BellSouth has used, and is aggressively continuing to use, its dominant market status to frustrate competition in the local voice market, thereby causing substantial and irreparable harm to Florida's CLECs and ultimately Florida's consumers.
- 6. In its current campaigns, BellSouth has embarked on a wave of "monetary inducement" promotional offerings. (Composite Exhibits A-H)² Each of these promotional campaigns have at least these three factors in common: (1) they exclusively target residential customers that have migrated to a CLEC; (2) the reacquired customers must have new service connected at the same address (and in some cases, using the same name); and (3) the promotion offers some form of a monetary inducement to the returning customer (i.e. \$100.00), thereby discounting the price of BellSouth's associated offerings, without allowing a CLEC to resell and take advantage of the discounted price.

telecommunications service price reduction is warranted.

Current BellSouth "monetary inducement" promotional offerings: **Exhibit A**, Tariff Filing No. T-04-1224, Effective from December 27, 2004 through December 26, 2005; **Exhibit B**, Tariff Filing No. T-05-0187, Effective from March 24, 2005 through December 31, 2005; **Exhibit C**, Tariff Filing No. T-04-1265, Effective from May 15, 2005 through December 31, 2005; **Exhibit D**, Tariff Filing No. T-04-1264, Effective from July 15, 2005 through December 31, 2005; **Exhibit E**, Tariff Filing No. T-05-0028, Effective from February 1, 2005 through December 31, 2005; **Exhibit F**, Tariff Filing No. T-04-1223, Effective from December 26, 2004 through December 31, 2005; **Exhibit G**, Tariff Filing No. T-04-1292, Effective from January 9, 2005 through December 31, 2005; **Exhibit H**, Tariff Filing No. T-04-0123, Effective from February 12, 2004.

7. Like BellSouth's previous winback tariffs (See Complaint of FDN against BellSouth in Docket No. 020119-TP and the Complaint of Arrow Communications against BellSouth in Docket No. 990043-TP), these promotional campaigns contain many of the same problems that have previously been found unacceptable by this Commission. BellSouth's current offerings violate both Section 364.051(5)(c) and 364.3381 of the Florida Statutes, which require BellSouth to price its services above direct cost. Further compounding the extent of the anticompetitive nature of these low-ball offerings, BellSouth refuses to allow Supra (and most likely all CLECs) to resell these promotional offerings (inclusive of the monetary inducements) in violation of 47 USCA § 251(c)(4), thereby ensuring that Supra is unable to match the severely discounted services being offered by BellSouth.

FACTUAL ALLEGATIONS

The BellSouth Base Product Offerings

- 8. BellSouth offers its various monetary inducement promotions in connection with two of its base offerings: Complete Choice and Preferred Pack service plans.
 - (1) The Complete Choice³ service plan includes the following:
 - A flat rate access line w/ Touch Tone capability
 - Free Unlimited Local Calling
 - Unlimited use of most prominent features
 - RingMaster Service

BellSouth's Complete Choice Service, Section A3.4.3; General Subscriber Service Tariff, Thirteenth Revised Page 24, Effective: February 15, 2005 (See Exhibit I).

BellSouth charges its retail end-users \$30.00 for an individual Complete Choice line. In addition, BellSouth charges \$6.50 for its End User Common Line Charge, for total revenue of \$36.50.

- (2) The Preferred Pack⁴ service plan includes the following:
 - A flat rate per access line with Touch-Tone capability;
 - Unlimited use of these popular features ordered by end-users: Call Waiting
 Deluxe, Three way calling, Call Forwarding Don't Answer
 - Caller ID-Deluxe
 - Voicemail Companion Services Package at no additional charge when Voicemail/Memory Call service is requested (Call forwarding busy line, Call Forwarding don't answer-Ring Control, Star 98 and MWI)
 - Privacy Director

BellSouth charges its retail end-users \$26.95 for an individual Preferred Pack line. In addition, BellSouth charges \$6.50 for its End User Common Line Charge, for total revenue of \$33.45.

9. By way of comparison, in order for Supra to replicate BellSouth's PrefferedPack Plan, the total recurring, and average usage and non-recurring costs⁵, together with a statewide weighted average loop cost calculated based upon the actual distribution of all Supra UNE-P customers, totals \$28.14 at FPSC-ordered TELRIC rates. Of course, as the FCC has recently determined that BellSouth need not offer mass market switching under Section 251 of the

BellSouth's Complete Choice Service, Section A3.4.6; General Subscriber Service Tariff, Second Revised Page 26.1, Effective: January 9, 2004 (See Exhibit J).

For services billed as UNE-P, retail, resale as available.

Telecommunications Act, these prices are going to go up. Absent Commission intervention forcing BellSouth to comply with its obligations under Section 271 of the Telecom Act, and based on BellSouth's most recent commercial offerings, the prices for local switching alone will go up by as much as \$7.00 on a recurring basis, and by as much as \$13.00 on a non-recurring basis. This means Supra's direct cost of goods sold to provide identical services is \$35.14, for a product that BellSouth makes available to its end-users at \$33.45.

The BellSouth Promotional Offerings

- 10. BellSouth now has five (5) categories of promotional tariff offerings, used both individually and in combination, to provide discounts to its base service offerings. These categories are:
 - Cash Back promotions,
 - Gift Cards promotions,
 - Coupons promotions,
 - Fee Waiver promotions, and
 - Discounted Service promotions.

BellSouth uses these categories in different combinations, and, often, allows combinations designed to increase the discounts offered only to CLEC customers on the underlying base service offerings.

11. The Cash Back promotional offering category:

The Cash Back promotional offerings category includes the \$100 Cash Back (Exhibit A), which is in effect from December 27, 2004 through December 26, 2005 and the \$100 Cash Back or

\$100 Visa Gift Card (Exhibit B), which is in effect from March 24, 2005 through December 31, 2005 (collectively referred to as "\$100 CASH" tariffs). A CLEC customer that purchases Complete Choice Family Plan or PreferedPack Plan is eligible to receive \$100.00 for switching back to BellSouth.

12. The Gift Cards promotional offering category:

The Gift Cards promotional offering category includes the Shoppers Cash Back (\$50 Cash Back or up to \$50 in merchandise) for Complete Choice or PreferredPack Plans (**Exhibit C**), which is in effect from May 15, 2005 through December 31, 2005, and the Single Family Dwellings (SFD) Gift Card Offer (includes a coupon for a gift card valued at \$50) (**Exhibit D**), which is in effect from July 15, 2005 through December 31, 2005 (collectively referred to as "GIFT CARD" tariffs).

13. The Coupons promotional offering category:

The Coupons promotional offering category includes the BellSouth Reacquisition 1FR Offer, (Exhibit E), which is in effect from February 1, 2005 through December 31, 2005. This promotional offering includes a Basic Line service, two features and a long distance plan from BellSouth Long Distance. Eligible customers who subscribe to a long distance plan will receive a coupon redeemable for up to \$50.00 cash back. (hereinafter referred to as "BELLSOUTH 1FR" Tariff).

14. The Fee Waiver promotional offering category:

The Fee Waiver promotional offering category includes the Line Connection Charge Waiver for local service connection fee, which is in effect from December 26, 2004 through December 31, 2005. (Exhibit F) (hereinafter referred to as "LINE CONNECTION WAIVER" Tariff). The

CLEC customer must either subscribe to the Complete Choice Plan or the PreferredPack Plan to receive the benefits of this offering.

15. The Discounted Service promotional offering category:

The Discounted Service promotional offering category includes the \$5 monthly discount from BellSouth's local service offering (**Exhibit G**), which is in effect from January 9, 2005 through December 31, 2005 (hereinafter referred to as "\$5 DISCOUNT" Tariff).⁶

- 16. Most of these promotional offerings state "the offer may be combined with other promotional offers for the same service." Today, prospective customers could realize monetary inducements in excess of \$145.00 by combining these BellSouth's promotions (i.e. \$100.00 cash back, plus \$5.00 discount off the base service plan (See Exhibit G), plus the waived local service connection fee (approximate value of \$40.88)).
- 17. BellSouth's combination of these promotions with its current pricing of \$30.00 for Complete Choice and \$26.95 for Preferred Pack has the effect of ensuring that BellSouth does not recover its costs for providing telephone service to the consumer unless the consumer stays with BellSouth in excess of thirty (30) months. These promotions are violative of §\$364.08, 364.051(5)(c) and 364.3381 Florida Statutes as they are priced below cost and therefore tantamount to BellSouth giving away free telecommunications service to a given class of customers.

With this offering, the CLEC customer must either subscribe to the Complete Choice Plan or the PreferredPack Plan, and also must subscribe to the BellSouth Long Distance Service Plan for \$1.00 a month (Exhibit H).

See Exhibits A-G.

The Law

- 18. Florida Statutes Chapter 364.01(4)(i) provides that the Commission shall "Continue its historical role as a surrogate for competition for monopoly services provided by local exchange telecommunications companies." (Emphasis added). The FPSC has been empowered to put together the necessary climate that will foster local competition in the telecommunications marketplace in Florida. By any measuring device imaginable, BellSouth is still the dominant provider of local telecommunications services in the state of Florida, particularly in the residential marketplace. Therefore, it is an imperative that this Commission address the substantial efforts that BellSouth has taken to under-cut competitive rates in the Florida residential telecommunications market. Florida Statute Section 364.3381 provides, in pertinent part:
 - (1) The price of a nonbasic telecommunications service provided by a local exchange telecommunications company shall not be below its cost by use of subsidization from rates paid by customers of basic services. . . .
 - (3) The commission shall have continuing oversight jurisdiction over cross-subsidization, predatory pricing, or other similar anticompetitive behavior and may investigate, upon complaint or on its own motion, allegations of such practices.

Furthermore, Section 364.059(1)(a) Florida Statutes, provides:

Any petition filed by a substantially interested party against a local exchange telecommunications company seeking a stay of the effective date of a price reduction for a basic local telecommunications service, alleging an anticompetitive price reduction pursuant to s. 364.051(5), s. 364.08, s. 364.09, s. 364.10, or s. 364.3381, shall be resolved by the commission pursuant to this section and by an order issued within 45 days after the date the petition is filed.

The Commission has Jurisdiction to Prevent Anti-Competitive Offerings pursuant to Florida Statutes § Section 364.01

19. Recognizing BellSouth's historically embedded advantage as the dominant provider of local telecommunications services, the Florida legislature has tried to create a level playing field by passing laws preventing BellSouth from abusing its market power and giving CLECs an opportunity to compete in the local telecommunications market. Section 364.3381(3) prohibits BellSouth from any type of marketing or pricing that could be deemed anti-competitive. Specifically, section 364.01(4)(g) states that the Commission shall exercise its exclusive jurisdiction in order to:

ensure that all providers of telecommunications services are treated fairly, by preventing anticompetitive behavior and eliminating unnecessary regulatory restraint.

BellSouth's promotional tariffs are anticompetitive offerings which are causing irreparable financial and economic harm to its CLEC competitors.

20. In Docket No. 990043-TP (Petition to review and cancel BellSouth Telecommunications, Inc.'s promotional tariff (T-98-1783) by Arrow Communications), ("Arrow Docket") the Commission voted to suspend BellSouth's tariff pending resolution of the petition. The Commission found (as noted on its February 2, 1999 Vote Sheet) that Arrow's Petition demonstrates that the alleged anticompetitive or discriminatory effect of the tariff will cause significant harm that cannot be adequately redressed if the tariff is ultimately determined to be

Specifically, Section 364.3381(3) reads as: "The commission shall have <u>continuing oversight jurisdiction</u> <u>over cross-subsidization</u>, <u>predatory pricing</u>, <u>or other similar anticompetitive behavior</u> and may investigate, upon complaint or on its own motion, allegations of such practices." (Emphasis added).

invalid. Such harm includes financial or economic harm to competing telecommunications providers.

- 21. Furthermore, BellSouth has repeatedly argued that this Commission's TELRIC UNE pricing has compelled BellSouth to sell its services to CLECs below cost. The packaging of these promotions demonstrates that one of two scenarios must be true: either (1) BellSouth's arguments regarding TELRIC UNE pricing being below cost are untrue or (2) BellSouth's residential service as offered is below cost and therefore anti-competitive.
- 22. True competitive service offerings are priced above cost and are sustainable over a long period of time. Services that are sold below cost are intended to unfairly steal market share and harm competitors. Inasmuch as BellSouth has not provided any evidence regarding how it will, at a minimum, break even on its local service offerings with the promotional tariffs, BellSouth's true intent in offering its promotional tariffs is not to offer a great plan to Florida consumers, but rather to thwart competition in the local telecommunications market and return BellSouth's dominant market position to its previous monopoly status. Because of BellSouth's large local market share and revenue base, it has the financial wherewithal to withstand any short-term revenue losses on these customers. Once BellSouth is successful in driving CLEC competitors out of the local market through its anticompetitive pricing, BellSouth can then raise the rates of its local services to recoup its losses.
- 23. Supra and other CLECs are suffering irreparable competitive harm caused by BellSouth's promotional tariffs. These promotional tariffs, when combined with the low prices BellSouth offers on its base products (Complete Choice and Preferred Pack) do not cover the direct relevant cost and are anticompetitive.

- 24. As noted in <u>Arrow v. BellSouth</u> and in <u>FDN v. BellSouth</u>, CLECs, such as Supra, compete with BellSouth largely on the basis of price. BellSouth's promotional tariffs offer select (i.e. CLEC) customers a combination of monetary inducements that are priced to undercut the prices Supra can profitably offer a customer. Florida CLECs cannot compete with BellSouth's monetary inducements (approximately \$145.88) targeted exclusively to CLEC customers.
- 25. The Commission needs to review the cost basis for the promotional tariffs. The Commission may act to halt (at least temporarily) any pricing conduct that is below cost or that appears anticompetitive. BellSouth's promotional tariffs pricing undercuts the prices Supra is able to offer and still remain profitable, and Supra has already and will continue to lose market share due to BellSouth's anti-competitive offerings. The harm that Supra has suffered and will continue to suffer from BellSouth's promotional tariffs cannot be undone. That harm has been constant, frequent, and continuous in character. More troubling is the fact that BellSouth's promotional tariffs directly harm Florida's consumers. As competitors are eliminated as a result of these BellSouth's promotional tariffs, consumers will have fewer competitive choices. As consumers have fewer competitive choices, prices will rise.
- 26. BellSouth would not be unduly prejudiced by suspension or postponement of its promotional tariffs in question. In balancing the interests of BellSouth, Supra and all CLECs, the irreparable harm Supra and all other CLECs will suffer clearly outweighs any possible disadvantage to BellSouth from delayed implementation of the monetary inducement promotional tariffs described above.

This is especially so in light of the recent regulatory decisions limiting CLECs' access to various Section 251 UNEs.

BellSouth Sells Services Below its Direct Costs in Violation of Florida Statutes § 364.3381, and 364.051

- 27. BellSouth's promotional tariffs, combined with its Complete Choice and Preferred Pack service offerings, are violative of §364.3381, Florida Statues, which provides, in pertinent part:
 - (1) The price of a nonbasic telecommunications service provided by a local exchange telecommunications company shall not be below its cost by use of subsidization from rates paid by customers of basic services.
 - (2) A local exchange telecommunications company which offers both basic and nonbasic telecommunications services shall establish prices for such services that ensure that nonbasic telecommunications services are not subsidized by basic telecommunications services. The cost standard for determining cross-subsidization is whether the total revenue from a nonbasic service is less than the total long-run incremental cost of the service. Total long-run incremental cost means service-specific volume and nonvolume sensitive costs.

Furthermore, §364.051(5)(c), Florida Statutes, provides that the "price charged to a consumer for a non-basic service shall cover the direct costs of providing the service . . ."

- 28. In the aggregate, the total monetary inducement to the customer is approximately \$145.88, and has the potential to be even greater. 10
- 29. BellSouth's currently tariffed retail rates for the PreferredPack and Complete Choice Plans for a single residence line are \$26.95 and \$30.00 monthly, respectively. At these rates, combined with the various promotions, a prospective customer would have to stay with BellSouth for at least 30 months before BellSouth begins to generate any net revenue from the former CLEC customer. Significantly, BellSouth's promotional offerings do not require eligible customers to stay with BellSouth for such a long period of time.

Both the \$100 and the \$100 Visa Card promotional offerings provide that, "offer may be combined with cash back offers or other promotional offers on the same services, as such offers may be concurrently available from

- 30. Tellingly, BellSouth's monetary inducement promotional tariffs combined with the already low price of the underlying base products, undercut the very same costs of provisioning the same services and/or elements to Supra.
- 31. This Commission has stated the following: "Section 364.051(5)(c), Florida Statutes, examines direct costs, and we believe an examination of direct cost is needed to make a determination of whether the post-discounted rates offered . . . remain "compensatory" for BellSouth." See Order No. PSC-03-0726-FOF-TP, at 21. "If a determination revealed that the (sic) such rates were "non-compensatory," such a finding would sway us to conclude that the tariff offerings are unfair, anticompetitive, or discriminatory." Id. at 22.

BellSouth Refuses to Allow Supra to Resell its Promotions in Violation of 47 USCA §251

- 32. The Telecommunications Act of 1996 ("TA 96"), §251(c)(4) and FCC Rules (47 C.F.R. §51.601 through 51.620) outline BellSouth's obligations with respect to making its promotional and discounted offerings available for resale. Sections 47 USC §251(c)(4) of TA 96 provide that the incumbent LECs are:
 - (A) to offer for resale at wholesale rates any telecommunications service that the carrier provides at retail to subscribers who are not telecommunications carrier; and
 - (B) not to prohibit, and to impose unreasonable or discriminatory conditions or limitations on, the resale of such telecommunications services, ...

Specifically, in FCC 96-325, the FCC concluded that:

time to time, provided that the Company reserves the right to prohibit the combination of the promotion with other promotions, at the Company's sole discretion)." (See Exhibits A and B).

Section 251(c)(4) provides that incumbent LECs must offer for resale at wholesale rates "any telecommunications service" that the carriers provides at retail to noncarrier subscribers. This language makes no exception for promotional or discounted offerings, including contract and other customer-specific offerings. We therefore conclude that no basis exists for creating a general exemption from the wholesale requirement for all promotional or discount service offerings made by incumbent LECs. A contrary result would permit incumbent LECs to avoid the statutory resale obligation by shifting their customers to nonstandard offerings, thereby eviscerating the resale provisions of the 1996 Act. (FCC 96-325, ¶948) (Emphasis added.)

- 33. It is undisputed that BellSouth has an obligation to make available for resale its promotional and discounted offerings that run for more than 90 days. Nevertheless, BellSouth refuses to make the promotions listed herein available to Supra for resale.
- 34. Resale is one of the entry strategies that Congress envisioned as a viable method through which CLECs could gain entry into the monopoly local telecommunications marketplace hence, the TA 96 requires that BellSouth shall not prohibit or impose unreasonable or discriminatory conditions or limitations on the resale of such promotional offerings whereby CLECs' ability to resale such monopoly telecommunications services are impacted.
- 35. The FCC re-emphasized the importance of resale as a method of entry when it promulgated Rules 51.601 through 51.0617: Resale obligation of all local exchange carriers. In FCC 96-325, concluded that

Promotional offerings greater than 90 days in duration must be offered for resale at wholesale rates pursuant to section 251(c)(4)(A). . . . In addition, an incumbent LEC may not use promotional offerings to evade the wholesale obligation, . . . (FCC 96-325, ¶950) (Emphasis added.)

In § 51.613(2) (ii), the FCC mandated that ILECs avail promotions that provide discounted rates when:

The incumbent LEC does not use such promotional offerings to evade the wholesale rate obligation, for example by making available a sequential series of 90-day promotional rates.

Nowhere in any of these provisions does there exist an exception allowing an ILEC to prevent or restrict monetary inducements from being available for resale. To the contrary, the FCC expressed that "We are concerned that conditions that attach to promotions and discounts could be used to avoid the resale obligation to the detriment of competition."

- 36. It is because of these provisions (and BellSouth's effort to obviate such) that the North Carolina Utilities Commission has enacted rules (Docket No. P-100, SUB 72b, Order issued on December 22, 2004l (See Exhibit K) that are intended to govern BellSouth's promotional tariff offerings in the State of North Carolina. The Indiana Utility Regulatory Commission is undertaking a similar effort in Case No. 42530.
- 37. BellSouth designed the referenced promotions with the simple goal of by-passing regulatory requirements that otherwise prohibit BellSouth from offering such "effective price" discounts to CLEC customers. The rationale is simple: while a direct price reduction to the effective tariff rate would impact the wholesale discount rate, BellSouth rationalized that a cash rebate and/or other traditional marketing tactics could pass approval without stringent scrutiny and therefore could be utilized to obviate a Commission finding that such approaches are tantamount to discounting of the effective tariff rate of the service(s) being offered. This is the same conclusion that the North Carolina Utilities Commission reached when it ruled that:

The FCC clearly stated that any other conclusion would allow ILECs routinely to create promotions or nonstandard offerings just to avoid their resale obligation. The FCC was concerned that ILEC promotions could become de facto standard offerings that would not be made available to

FCC 96-325, ¶952.

Supra's Petition Seeking Review of BellSouth's Promotional Tariffs

resellers and would therefore undercut the duty to resell retail services to resellers at wholesale rates. 12

38. The reality is that BellSouth's promotions provide economic value to customers. This is the conclusion reached by the North Carolina Utilities Commission:

The Commission is persuaded that anything of economic value paid, given, or offered to a customer to promote or induce purchase of a bundled service offering of both regulated and nonregulated telecommunications services is a promotional discount.¹³

The North Carolina Utilities Commission further ruled that

The customer does not receive this savings or value unless he purchases the specified bundle associated with the promotion. Thus, because the savings or benefit is received only in exchange for the purchase of the bundle, the bundle is in effect discounted to the customer by the amount of the monetary benefit or thing of value provided in return. (North Carolina Order, at 3)

39. Even if not used to directly pay off BellSouth's telecommunications bills, the reality is that the monetary savings resulting from these inducements effectively off-sets other monetary obligation(s) of the end-users. This is the same conclusion that the North Carolina Commission reached when it stated, "while these promotions do provide a savings and therefore a type of discount to subscribers, they do not in fact lower the charge to the subscribers for the regulated services purchased...", and "the promotion reduces the subscriber's cost for the service by the value received in the form of a gift card or other giveaway." (North Carolina Order at 12, and 11)

North Carolina Order, Docket No. P-100, SUB 72b, at 9.

^{13 &}lt;u>Id</u>, at pg. 3.

40. Therefore, these promotional inducements should be construed to be direct telecommunications services as per Chapter 364.02(12)¹⁴ or at a minimum, derivative telecommunications services. This Commission reached a similar conclusion when it found that BellSouth's Late Payment Charge was a telecommunications "service" in Order No. PSC-01-1769-FOF-TL, Docket No. 000733-TL. These inducements can indeed be characterized as derivative telecommunications services following their importance and inclusion as integral parts of BellSouth's marketing scheme, not because they have a transmission capacity in and of themselves, but simply because BellSouth relies on these inducements to build, enhance, and sustain its market share.

WHEREFORE, Supra respectfully requests that this Commission:

- (1) Review and cancel BellSouth's promotional inducement tariffs immediately or, in the alternative, order BellSouth to allow Supra to collect on these inducements when it resells these same underlying services;
- (2) If these promotional inducement tariffs are not immediately cancelled, then grant Supra a hearing within 45 days pursuant to Section 364.059(1)(a) Florida Statutes; and
- (3) Initiate an investigation of BellSouth's promotional pricing and marketing practices; and

[&]quot;Service" is to be construed in its broadest and most inclusive sense.

We find that BellSouth's interest charge is a "service" that BellSouth renders to its delinquent telecommunications customers. We believe that **through the use of its interest charge**, BellSouth is able to keep these delinquent customers as telecommunications subscribers. The alternative is for BellSouth to terminate the accounts of all delinquent customers. We find that the <u>interest charge is a "service" BellSouth renders its delinquent customers for carrying their unpaid balances.</u> In turn, BellSouth uses the realized revenues to offset the loss of use of the unpaid monies. Order No. PSC-01-1769-FOF-TL, Issued: August 30, 2001in Docket No. 000733-TL (pages 9 and 10) (Emphasis added.)

(4) Grant such other relief as deemed appropriate.

Respectfully submitted this 3rd day of June 2005.

SUPRA TELECOMMUNICATIONS AND INFORMATION SYSTEMS, INC. 2901 S.W. 149th Avenue, Suite 300,

Miramar, Florida 33027 Telephone: (786) 455-4248 Facsimile: (786) 455-4600

BRIAN CHAIKEN

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the foregoing was delivered by U.S. Mail to the persons listed below this 3rd day of June 2005.

Ms. Nancy White c/o Nancy Sims BellSouth Telecommunications, Inc. 150 S. Monroe Street Suite 400 Tallahassee, FL 32301 Ms. Beth Keating Legal Division Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

By:____**'**

BRIAN CHAIKE

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TYCH CANAGEMENT PARTOED

9677 224 (098) *** (988) 254 5071 December 10, 2004

Ms. Beth Salek, Director
Division of Competitive Markels and Enforcement
Florids Public Service Commission
2540 Shumard Oak Boulevard
1allahassee, Florida 32399-0850

Cear Ms. Salak:

Pursuant to Florida Statute 364.051, we are filling revisions to our General Subscriber Service Terriff.
Altached for filling with the Commission is the following land page:

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These revisions establish the \$100 Cash Back promotion. Attachment A contains an Executive Summary of the program.

Yours very truly.

LEC POORTS

Regulatory Vice President

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\$100 Cash Back Offer

Overview

The \$100 Cash Back Offer promotion is scheduled to begin on December 27, 2004 and end on December 26, 2005. Services included in this promotion are:

ReliSouth® Complete Choice® plan (single or multiple lines)

BellSouth* Area Plus* with Complete Choice* plan (single or multiple lines)

BellSouth¹ PreferredPack⁴ trlan

Promotion Specifics
Customers returning to BellSouth and purchasing a qualifying local service product will be eligible to receive \$100 cash back.

Restrictions/Eligibility Requirements

- Customer must have at least one wire line local service or equivalent (wireless in lieu of wire line) with a provider other than Bell South at a local service address within Bell South territory. A new service qualifying for this promotion must be provisioned as a replacement for the existing wire line or equivalent service.
- Customer must request the qualifying service at the same address and in the same name as the existing service, unless customer is planning an imminent move from one address in Bell South territory to another address in Bell South territory within 30 days of responding to the offer. In the case of an imminent move, Bell South can offer the customer the promotion and place the order at the new address.

Customer must have not had local service with BellSouth for at least ten (10) days prior to the new service connection date to be elicible.

- Customer must switch their local service to Bell South and purchase any one of the following: Complete Choice plan. Complete Choice Two-Line Plan package. Complete Choice Three-Line Plan package, Area Plus with Complete Choice plan, Area Plus with Complete Choice Two-Line Plan package, Area Plus with Complete Choice Three-Line Plan package, or PreferredPack plan.
- Customer must place the order on or before 12/26/05.
- Offer valid for only one (1) service line at the intended local service address.
- Customer must place their order through a BeltSouth business office or outbound (elementating ventor or atternate channel.
- Customer must complete and mail a reballe coupon to a specified address by the date specified on the coupon in order to receive the \$100 cash back.
- After customer completes the above requirements, heighe will receive the \$100 cash back. If customer cancels or discontinues the qualifying service prior to fulfillment. neishe will be inaliable for the cash back ofter.
- BelScruth reserves the night to discontinue or modify this promotion of any time without customer notice.
- Customer must have the eligible services on their new service (N) order to receive the promotional offer.
- Offer may be combined with cash back offers or other promotional offers on the same services, as such offers may be concurrently available from time to time. provided that the Company reserves the right to prohibit the combination of this promotion with any other promotion, at the Company's sole discretion.

First Restant Page 32 i Cancels Congrisal Page 32 i

RELIGIOUS TELECOMMUNICATIONS, INC FLORIDA

INSUED: Electric 12-3000 Decodes 10, 2012 BY: Recept F. Lecher, President, Fit.

Maini, Florida

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A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cont'd)

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Cancels Original Page 32.2

CENERAL SUBSTRIBUTE SERVICE PARIFF

BULLSOUTH

TELECOMMUNICATIONS INC

FLORIDA

CONTROL PARAMETER AND PROPERTY OF

BY Joseph P. Lackett, Problem - 17

Mami, Hemila

FFFCTTV - 48448--- 24440000000 27 2004

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Copi'd)

A. The following premotions are on the with the Commission (Cont.)

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Brilloca TE THE ECOMMUNIC VITONS, THE FLORIDA ISSUED: December 10, 2004 99 South P. Cacher, Provided St. Maga Florida

AZ. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cost'd)

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COMPANIES AND ASSESSED.

BELLSMITH. BLECOMMUNICATIONS INC VICEUDA. (SSITTED: December 15, 1904 BY: Joseph F. Leither, President FL

Mizms, Florida

First Revised Papt 31.1 Cancels Original Page 32.1

EFFECTIVE December 27, 2004

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cent'd)

A. The following promisions are in the with the Continueston (Confe)

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TOBOLS?

SeliSouth Telecommunications, Inc. 150 South Monite Street SLOP 400 Tallations park, Points 32301

Marylall M. Crisor II Vice President Requietry & External Affairs

manhall creed by 1000 co.

850) 224-77 W Fate (850) 224-5073

March 9, 2005

Beth Salak, Director Competitive Markets and Enforcement Attn: Tariff Section 2540 Shumard Oak Boulevard Tallahessee, Florida 32399-0650

Dear Ms. Salax:

Pursuant to Florida Statute 364.051, we are filing revisions to our General Subscriber Service Tariff. Attached for filing with the Commission are the following tariff pages:

Section A2 - Second Revised Page 32.1

Second Revised Page 32.2 Twenty Seventh Revised Page 33 Third Revised Page 35.6.8 Second Revised Page 35.6.9

These revisions add a gift card option to the \$100 Cash Back Offer. Attachment A contains an Executive Summary of the program.

Acknowledgment, date of receipt and authority number of this fling are requested.

auhall M. Criscistains

Regulatory Vice President

Attachments

1000137

BeilSouth Telecommunications - Florida Attachment A Page 1 of 1

Promotion Description

\$100 Cash Back or Gift Card Offer

Overview

The \$100 Cash Back Offer promotion began on Decamber 27, 2004, and is scheduled to end on Decamber 26, 2005. That promotion will be terminated early on March 23, 2005, and will be replaced by the \$100 Cash Back or Gift Card Offer. The \$100 Cash Back or Gift Card Offer promotion is scheduled to begin on March 24, 2005, and end on December 31, 2005. Services included in this promotion are:

Bell South * Complete Choice* plan (single or multiple lines)

BellSouth* Area Plus* with Complete Choice* plan (single or multiple lines)

BellSouth* PreferredPack* clain

Francisa Specifica

Customers returning to BellSouth and purchasing a quelfying local service product will be eligible to receive either \$100 cash back or a \$100 Visa* gift card.

Restate les estélitates la Restation de la Res

- Customer must have at least one wire line toos service or equivalent (wheleas in lieu of wire line) with a provicer other than BellSouth at a local service address within BellSouth territory. A new service qualifying for this promotion raust be provisioned as a replacement for the existing wire line or equivalent service.
- Customer must request the qualifying service at the same address and in the same name as the
 existing service, unless customer is planning an imminent move from one address in BellSouth
 territory to another address in BellSouth territory within 30 days of responding to the offer. In the case
 of an imminent move, BellSouth can offer the customer the promotion and place the order at the new
 address.

 Customer must have not had local service with BellSouth for all least ten (10) days orfor to the new service connection date to be eligible.

- Customer must switch their local service to BelSouth and purchase any one of the following.
 Complete Choice plan, Complete Choice Two-Line Plan package, Complete Choice Three-Line Plan package, Area Plus with Complete Choice plan. Area Plus with Complete Choice Two-Line Plan package, Area Plus with Complete Choice Three-Line Plan package, or PreferredPack plan.
- Customer must place the order on or before December 31, 2005.
- Offer valid for only one (1) service line per local service address.
- Customer must place the order through a BellSouth business office or outbound telemerketing vendor or alternate channel.
- Customer must complete and mail a rebate coupon to a specified address by the date specified on the coupon in order to receive either the \$100 cash back or gift card.
- After customer completes the above requirements, he'sho will receive either the \$100 cash back or
 gift card. If customer cancels or discontinues the qualifying service prior to fulfillment, he'she will be
 ineligible for the cash back or gift card offer.
- BellSouth reserves the right to discontinue or modify this promotion at any time without customer notice.
- Customer must have the eligible services on their new service (N) order to receive the promotional
 offer
- Customer may not receive both the \$100 cash back and the \$100 gift card. If customer does not
 specify which reward ho/she prefers, customer will receive the \$100 cash back.
- Offer may be combined with cash back offers or other promotional offers on the same services, as such offers may be concurrently available from time to time, provided that the Company reserves the right to prombit the combination of this promotion with any other promotion, at the Company's sole discretion.

All BellSouth marks contained herein are owned by BellSouth Intellectual Property Corporation.

Vise is a registered trademark of Visa International Service Association.

SELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA
ISSUED: December 14, 2004 March 9, 1904
BY: Joseph P. Lacher, President -FL
Mismi, Florida

CENERAL SUBSCRIBER SERVICE TARJES

From <u>Navine</u> Reviews Page 32.1 Cancels Original Fage Reviewd Page 32.1

EFFECTIVE: Demonstrate: 1444-1460-124-2005

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.19.2 Descriptions (Cost'd)

A. The following promotions are on the wife the Commission (Confd):

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Via a registral tales of a Via harmonial Server Applicable.

BELLSOUTH TELECOMMUNICATIONS, INC. FL CWLEDA

GENERAL SUBSCRIBER SERVICE TARIFY

Page Second Revised Page 32.2 Canada Geograph Front Revised Page 32.2

EFFECTIVE: December 33, 3004 March 24, 2005

(SS(FE)): December 10, 2004 March 9, 2005 BY: Joseph F. Lacher, President -FL Missol, Florida

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Coat'd)

A. The following proposions are on the with the Commission: (Conf.):

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BELLSOUTH
TELECOAMARDSCATIONS, INC.
FLORIDA
ISSUED: December 17, 2044 March 9, 2022
BY: Joseph P. Lacher, Provident FL.
Miseri, Florida

GENERAL SURVENIEER SERVICE TARIFF

Twenty Several Smith Revised Page 33 Canach Townsy Sixth FiAb Revised Page 33

EFFECTIVE: Messagy i March 24, 2005

AZ. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.19.2 Descriptions (Cost'd)

A. The following promotions are approved by the Commissions (Comfd.)

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A2. GENERAL REGULATIONS

A2.10 Special Promotions (Confd)

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A2.10.2 Descriptions (Coas'd)

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BELLSOUTH TELECOMMUNICATIONS, INC. FLORIDA

ISSUED: December 17-2004 Merch 5, 2005 BY: Joseph P. Lacher, President -FL Miseral, Florida GENERAL SHASCRIAFA SERVICE TARIFF

Sure-Second Revised Page 35.65 Cancels Ongood-Ema Revised Page 35.65

EFFECTIVE: Amount - Nact 24, 2005

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.7 Descriptions (Cont'd)

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A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

AZ 18.3 Descriptions (Court.)

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BELLSOUTH TELECOMMUNICATIONS, INC. PLORIDA ISSUEL: March 9, 1007 BY: Joseph P. Lacher, Frences FL Migro, Frence CENERAL SUBSCISSES SERVICE TAKES

Second Revised Page 32.2 Cancels First Revised Page 32.2

EFFECTIVE: Name: 24, 2005

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Conf'd)

A2.10.2 Descriptions (Cont'd)

A. The following promotions are on file wat the Commission: (Conf.6)

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BELLSOUTH TELECOMMUNICATIONS, DIC PLORIDA ISSUED: Merch 5, 200.5 RY lesesh F. Lactor President A. Miami Florida

CENERAL SUBSCRIPER SERVICE TARTE

Twenty Severals Revised Page 3: Caracia Twenty Sixth Revised Page 33

EFFECTIVE: March 24, 2005

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A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.18.2 Descriptions (Cont'd)

A. The following promotions are approved by the Communication (Conf.)

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Service NAME OF THE PARTY

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A2. GENERAL REGULATIONS

A2.10 Special Promotions (Confd)

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BELLSOUTH TELECOMMUNICATIONS, INC FLORIDA ISSUED: March 5, 2005 BY, losed F. Lacier, President 5). Missri, Florida

CENERAL STRUCKSONS STRUCT TARTS

Second Revised Page 13.6.9 Canada Ford Revised Page 35.69

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AZ. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cont'd)

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acilSouth Telecommunications, Inc. 100 South Morroe Street Sotte 400 Tatenasses, Honda 32301

medial Carifolists (CAC)

Morehall M. Criser 8 Vice President Pepulatory & Esternal Affens

(850), 224-77)(6 Fax. (880), 224-5073

December 17, 2004

Beth Salak, Cirector Competitive Markets and Enforcement Attn: Tariff Section 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Dear Ms. Salak:

Pursuant to Florida Statute 364.051, we are fling revisions to our General Subscriber Service Tanif.

Attached for filing with the Commission is the following tariff page:

General Subscriber Service Tenff

Section A2 - Twenty South Revised Page 33

These revisions extend the Shoppers Cash Back promotion. Attachment A contains an Executive Summary of the program.

Acknowledgment, date of receipt and authority number of this filing are requested.

Yours very truly.

Regulatory Vice President

Attachments

BallSouth Telecommunications - Florida Angrement A Page 1 of 1

Promotion Description

Shoppers Cash Back Extension

Overview

The Shoppers Cash Back promotion began May 15, 2004, and was scheduled to end December 31, 2004. The Company will extend the end date of this promotion until December 31, 2005.

Promotion Specifics

New or existing customers who contact Bell-South and request information on local service or bundle prices for comparison with competitive offers and indicate a reluctance to place an order during the call will be offered a coupon redeemable for up to \$50 Cash Back or up to \$50 in merchandise as an incentive to close the sale.

Existing customers who contact BeliSouth to downgrade or disconnect their service will be offered a coupon redeemable for up to \$50 Cash Back or up to \$50 in merchandise if they agree to extend their service at a level that satisfies the criteria specified below.

Registrational Elicibility Requirements

This Cash Back offer is fimited to customers subscribing to or ordering one of the following services:
 the PreferredPack plan.

- b. any of the Complete Choice plans, or
- c. flet rate individual line service with at least one vertical feature and at least one of the following services: a BellSouth Long Distance plan, a BellSouth Internet access plan or a Cinquia?" wireless plan.
- 2. Customer must have the eligible services on their new service order (N) or must maintain their current services on their existing account to receive a redeemable coupon.
- A new customer must place a qualifying order on or before December 31, 2005.
- Offer valid for only one (1) service line at the qualifying local service address.
- 5. The customer must fill cuit a coupon and mail the coupon to a specified address by a specified date to receive the cash or merchandise.
- If the customer cancels or discontinues the qualifying service prior to fulfillment, they will be ineligible for the cash back offer.
- 7. This offer may be combined with other cash back or promotional offers on the same services, as such offers may be concurrently available from time to time, provided that the Company reserves the right to prohibit the combination of this promotion with any other promotion at the Company's sole discretion
- This offer cannot be combined with reacquisition cash back offers.
- 9. Ball South reserves the right to discontinue or modify this promotion at any time without customer notice

CONTRAL SUBSCIENCE SERVICE TARITY

BELL SOLUTH
TELECOMMUNICA INONS. INC
FLORIDA
ISSUED: Describe L'April 10, 1984
BY: Leseph P. Lesier, President FI.

Moans, Florida

Twenty <u>Sixth</u> Fish Revised Page 25 Canada Twenty <u>Fifth</u> Fourth-Revised Page 35

EFFECTIVE: James VI 2005 May 15-2944

AZ. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cont'd)

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Twenty Sixth Revised Fage 33 Canada Twenty Fifth Revised Page 33

EFFECTIVE: Landary 1, 2005

Period

12/11/05

BELL SOUTH
TELECOMMUNICATIONS, INC.
FLORIDA
ISSUED: December 17, 2004
BY Joseph P. Lacher, Fresidens -FL
Minmi, Florida

A2 GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cost'd)

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		personal as such offers may be constructed to a spiletic from more to have, provided the
		the Company reserves the signs to provide the combination of this promotion with any sides promotion of the Company's solve discretion.
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DOUDS TIME T MIA Competition Markets and Enforcement Berb Salak, Director

Tallahassac, Florida 32399-0350 Developh and beinging (42);

effective dates for this tarieff package are December 17, 2004 and lanuary 1, 2005, respectively. Parsuant to Florida Statute 364.051, enclosed is a package filling for SFD Giff Card Offer. The issue and

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COURS NAUG LUNGS

Marshall M. Crise: III rats

Regulation Vice President

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Promotion Description

SFD Gift Card Offer Extension

Proposed Promotion

BellSouth SFD Gift Card Offer, which began July 15, 2004 and ends December 31, 2004, is extended from January 1, 2005 to December 31, 2005. Customers moving into targeted, newly constructed Single Family Dwellings, Townbomes or Condominiums will receive collateral redeemable for a gift card valued at fifty-dollars (\$50.00). The gift card will not be redeemable for cash.

Promotion Specifics

- Extended from January 1, 2005 to December 31, 2005.
- Targeted at customers who purchase newly constructed SFDs (Single Family Dwellings) in contracted communities.
- Customers receive collateral from the SFD sales offices with instructions to place their order via an online tool or to an 800 number to BellSouth.
- 4. To redeem the coupon, the customer must first establish service with BellSouth via online ordering tool or designated 800 number or by contacting a BellSouth representative in a BellSouth call center. After establishing service, the customer must enter their new selephone number onto their coupon before redeeming.
- Customers establishing service in son-targeted SFD locations may receive a coupon for fulfillment upon demand.

Restrictions/Elistbility Requirements

- Offer available only to customers establishing service (N or T order) in a newly constructed SFD.
- Customers returning to BellSouth must not have had local service with BellSouth at least ten (10) days prior to the new service connection date.
- The customer must place the order on or before December 31, 2005.
- 4. Offer valid for only one (1) service line per local service address.
- Customer is limited to one (1) gift card coupon per twelve (12) month period.
- The customer must place their order through a BellSouth business office or outbound telemarketing vendor or the alternative channel indicated on the direct mail piece or collateral provided.
- Offer may not be combined with Reacquisition \$100 Cash Back offer or Reacquisition \$25 VIP Gift Card or Reacquisition \$25 Visa Gift Card or \$50 Shoppers Cash Back or Service Connection Waiver.
- 8. Offer may be combined with cash back offers or other promotional offers on the same services, as such offers may be concurrently available from time to time, provided that the Company reserves the right to prohibit the combination of these promotions

GENERAL STRKKRIBER SEKVILE LARLES

BELLSOUTH TELECOMMUNICATIONS, INC FLORIDA

ISSUED: Jacobas, 17, 2003 June 10, 2004 NY: Joseph P. Lacker, President #1.

Miami, Florida

Company First Revised Page 35 (6) Cancelle Original Page 35.69

Home Harris and Ext ECTIVE February 1, 2005

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cont's)

A. The following promotions are on file with the Commission: (Confd):

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		To reduce the coupon the instance must first establish service with RellSouth via values entering tool or despised 800 number or by connecting a RellSouth representative to a RellSouth call restor. After establishing service, the customer must state their new telephone marks can men coupon before reducing.		e
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GENTRAL SUBSCRIBER SERVICE TARRET

First Revised Page 35.6.5 Cancels Original Page 35.6.9

EFFECTIVE: Section 1, 2005

RELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA
ISSLED: Decomber 17, 2004
RY: Joseph P. Lacher, President -FL
Munic. Florida

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

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그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그 그	-Contempos returning to Bell-South most are have had been service with Bell-South in least less (10) days prior to the new service compaction days.	
	-The columns must have the order on at before Documber 11, 1961.	
	-Office would be only one (1) service line per local service inflores.	
	-Consecut is limited to one (1) gift used company per section (17) month period.	
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	523 VW Gift Cami or Rescoparation 525 Visa Gift Gord or 550 Shoppers Cash Book or	
	Server Carelessa Water	
	-Office was by combined with cost back officer or other promotional officer on the same	
	station, to seek office may be executably enable from time to lane, provided that	
	the Company reperves the right to probable the combination of those promotives with my	
	other programmes at the Company's sole discretion.	
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BellSouth Telecommunications, Inc. 150 South Monroe Sited

Suite 400

Tallatasses Figure (C.C.)

maranas pi<u>ser@</u>belsk<u>uti Co</u>t

Marakali M. Oriser III Vice Provideni Regulatory & External Allaira

January 14, 2004

Beth Salak, Director Competitive Markets and Enforcement Attn: Tariff Section 2540 Shumard Oak Boulevard Talkdrassee, Florida 32398-0856

Dear Ms. Salak:

Enclosed is a package filling to revise the end date for BellSouth IFR+2 Free Features Promotion from March 31, 2005 to January 31, 2005

General Subscriber Service Taciff

Section A2

2rd Revised Page 355&3

The issue and effective dates for this tariff package are January 14, 2004 and January 31, 2005, respectively.

Acknowledgment, date of receipt and authority member of this filing are requested. A duplicate letter of transmittal is attached for this purpose

Your consideration and approval will be appreciated

Yours very inuly.

Regulatory Vice Presidera

Attachments

7054008

Promotion Description

1FR with 2 Features At No Charge for 12 Months Promotion (Extension)

Proposed Promotion

The IFR with 2 Features At No Charge for 12 Months is extended until January 31, 2005.

Promotion Specifics:

This promotion offers reacquisition or winover customers who purchase a IFR (local line) from BellSouth and who are not currently using BellSouth for local service, two (2) features at no charge for twelve (12) months.

Restrictions/Eligibility Requirements:

- Customer must either not currently have local service with BellSouth or not have service with BellSouth on one or more of their existing lines, including the line on which the service qualifying for this promotion will be provisioned.
- Customer must have local service or equivalent (wireless in tieu of wire-line) at the same local service address on one or more of their existing lines.
- 3. Customer must request service at the same address and in the same name, unless customer is planning an imminent move from one address in BellSouth territory to another address in BellSouth territory within 30 days of responding to the offer. In the case of an imminent move, the BellSouth rep can offer the customer the promotion and place the order at the new address.
- Customer must have not had local service with BellSouth at least 10 days prior to the new service
 connection date.
- 5. The customer must switch their local service to BellSouth and purchase BellSouth basic service.
- 6. The customer must place the order on or heliore January 31, 2005.
- Offer valid for only one (1) service line at the intended local service address.
- 8. The customer must place their order through a BellSouth business office or outbound telemarketing vendor or alternate channels as indicated.
- Once the customer completes the above requirements they will receive three local line features
 without charge for 12 months. If the customer cancels or discontinues the qualifying service, he
 will be ineligible for this offer.
- 10. BellSouth reserves the right to discontinue or modify this promotion at any time without customer notice.
- 11. Customer must have the eligible services on their new service order (N) in order to receive the promotional offer.
- This promotion may not be combined with the Reacquisition \$100 IFR + 2 features Cash Back offer.
- 13. Offer may not be combined with any cash back offers however, this offer may be combined with other promotional offers on the same services, as such offers may be concurrently available from time to time, provided that the Company reserves the right to prohibit the combination of this promotion with any other promotion, at the Company's sole discretion.

CHNERAL SUBSCRIBER SERVICE TARBE

BELLSOITH

TELECOMMUNICATIONS, INC.

FLORIDA

ISSUED: January 14, 1003 September 23, 2005

BV: Joseph P. Lacher, President - FL Miami, Florida Fine Scored Review Page 35 5.8.3 Caracle Eins Review Page 35 5.8.3

EFFECTIVE (MINERY 31 2005 (A-WHATS, 2004)

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

Al.103 Descriptions (Cont'd)

A. The following promotions are on file web the Commission: (Conf. 4)

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Second Revised Page 35.5 & 3 Cancella From Revised Page 35.5 & 3

EFFECTIVE: James 31: 2005

BELLSCOTH
TELECONDMUNICATIONS INC
FLORIDA
ISSUED: Jaquery 14, 2005
BY: Joseph P. Lecher, President -FL

Miams Florida

AZ. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cont'd)

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Mar shadi M. Criser III Voc-Proodert Regulatory & External Alfains

BellSouth Telecommunications, inc. 150 South Monton Street Soite 400 Tultahasson, Florida 3230*

marshall criscost ballsouth core

(850) **Z24-**7798 Fax (850) 224-5073

December 10, 2004

Both Salak, Director Competitive Markets and Enforcement Atm: Tariff Section 2540 Shumard Oak Boolevard Tallahassee, Florida 32399-0850

Dear Ms. Salak:

Enclosed is a package filing for DellSouth Line Connection Fee Waiver Extension

Copietal Subscriber Service Tariff

Section A2

?* Revised Page 32.4

The issue and effective dates for this tariff package are December 10, 2004 and December 26, 2004, respectively.

Acknowledgment, date of receipt and authority number of this filing are requested. Your consideration and approval will be appreciated.

Yours very truly,

Marshall M. Criser III mrs

Regulatory Vice President

Anachments

Executive Summary

Line Connection Charge Waiver Extension

Planned Promotion

The Line Connection Charge Waiver promotion is extended to December 26, 2005. Services included in this promotion are:

- Beil South Complete Choice plan
- · RellSouth PreferredPack plan
- BellSouth basic service and one (1) custom calling (or Touchstar service) local features

Promotion Specifics:

Specific features of this promotion are as follows:

Waived line connection charge to reacquisition or winover residential customers who currently are not using BellSouth for local service and who purchase BellSouth Complete Choice service, BellSouth PreferredPack service, or basic service and one (1) features will be waived.

Restrictions/Eligibility Requirements:

- Customer must either not currently have local service with BellSouth or not have service
 with BellSouth on one or more of their existing lines, including the line on which the service
 qualifying for this promotion will be provisioned.
- . This promotion is not valid for out-of-region customers who are new to BellSouth.
- Customer must have local service or equivalent (wireless in lieu of wire-line) at the same local service address on one or more of their existing lines.
- Customer must request service at the same address and in the same name, unless customer is
 planning an imminent move from one address in BellSouth territory to another address in
 BellSouth territory within thirty (30) days of responding to the offer. In the case of an
 imminent move, the BellSouth rep can offer the customer the promotion and place the order
 at the new address.
- The customer must switch their local service to BellSouth and purchase any one of the
 following: BellSouth Complete Choiceplan, BellSouth PreferredPack plan, or BellSouth
 basic service and one (1) custom calling (or Touchstar service) local features.
- The customer must place the order on or before December 26, 2005.
- Offer valid for only one (1) service line at the intended local service address.
- The customer must place their order through a BellSouth business office or outbound telemarketing vendor or alternate channels as indicated.
- BellSouth reserves the right to discontinue or modify this promotion at any time without customer notice.
- Customer must have the cligible services on their new service order (N) in order to receive
 the promotional offer.
- Offer may be combined with other offers for the same service at the same time.

All BellSouth marks contained herein are owned by BellSouth intellectual Property Corporation.

BELLSOCIE TELECOMMUNICATIONS, INC. FLORIDA

ISSUED: Decomber 10, 2004 Decomber

BY . Askepts F. Cauter, President -FL Miano, Perida

Angent from Marina Page 122 Cassistic Crountal Care 724

STEETIVE DOCUMENTS, 2004-benning at 3004

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cont'd).

A. The fellowing promotions are on file with the Commission (Confd)

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EFFECTIVE Cesember 24, 2004

BELLSOUTH TELECOMMUNICATIONS DOL FLORUGA ISSUED: Devember 1, 2004 BY loopph P Lacher Fresiden -FL Mann, Frends

A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cont'd)

A. The following promotions are on the with the Commission: (Confd)

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BollSouth Telecommunications, inc 150 South Morroe Sires State 460 Tallahassec, Florata 12301

Marshall M. Orient III Vice President Pegolalany & External Allers

(1875) Bill (1964) (1975) Bill (1975)

(850) 234-77(8 Fax (850) 224-5073

December 24, 2004

Beth Salak, Director Competitive Markets and Enforcement Attn: Teriff Section 2540 Shumard Oak Boulevard Tallahassee, Florida 32399-0850

Dear Ms. Salak:

Pursuant to Florida Statute 364.051, we are filing revisions to our General Subscriber Service Tariff.

Attached for filing with the Commission is the tollowing tariff page:

General Subscriber Service Tenff

Section A2 - Second Revised Page 32.8

These revisions restart a special promotion for Complete Choice* service and the PreferredPack* plan.

Attachment A contains on Executive Summary of the program.

Acknowledgment, date of receipt and authority number of this filing are requested.

Yours very truly.

Regulatory Vice President

Attachments

BeilSouth Telecommunications - Florida Attachment A Page 1 of 1

Promotion Description

\$5 Discount for Reacquisition and Winover

Overview

The \$5 Discount for Reacquisition and Winover promotion is scheduled to begin on January 9, 2005 and end on December 31, 2005. Services included in this promotion are the BellSouth* PreferredPack* plan and the BellSouth* Complete Choice* family of plans.

Promotion Specifics

Any potential customer who is currently using someone other than BellSouth for local service and who switches to BellSouth and purchases 1) the BellSouth PreferredPack plan or any product in the BellSouth Complete Choice plan family and 2) any BellSouth Long Distance product other than BellSouth Long Distance Unlimited service will receive a \$5 monthly discount on the PreferredPack plan or the product from the Complete Choice plan family.

Restrictions/Eligibility Requirements

- Customer must either not currently have local service with Bell South or not have service with Bell South on one or more of their existing lines, including the line on which the service qualifying for this promotion will be provisioned.
- Customer must have local service or equivalent (wireless in Seu of wire-line) at the same local service address on one or more of their existing lines.
- 3. Customer must request service at the same address and in the same name, unless customer is planning an imminent move from one address in BellSouth territory to another address in BellSouth territory within 30 days of responding to the offer. In the case of an imminent move, the BellSouth representative can offer the customer the promotion and place the order at the new address.
- Customer must have not had local service with Bell South for at least 10 days prior to the new service connection date.
- The customer must switch their local service to Bell South and purchase the following products:
 - a. The PreferredPack plan or a product from the Complete Choice plan family, and
 - b. A BellSouth Long Distance product other than BellSouth Long Distance Unlimited service. A specific long distance plan must be selected. Selecting a BellSouth PIC and LPIC without selection of a Long Distance plan will not qualify a customer for this discount.
- Customer must have the eligible services on their new service order (N) in order to receive the cromotional offer.
- The benefits of this promotion will be extended to existing BoilSouth customers who call the BellSouth business office and request this specific offer.
- 8. The customer must place the order on or before December 31, 2005.
- Offer valid for only one (1) service line at the intended local service address.
- The customer must place their order through a Bell-South business diffice or outbound telemarketing vendor or alternate channel.
- 11 Once the customer completes the above requirements they will receive the \$5 discount on their monthly bill. If the customer cancels or discontinues one or more of the qualifying services, he will be ineligible for the discount.
- 12. Bell-South reserves the right to discontinue or modify this promotion at any time without notice
- 13. Offer may be combined with cash back offers or other promotional offers on the same services, as such offers may be concurrently available from time to time, provided that the Company reserves the right to prohibit the combination of this promotion with any other promotion, at the Company's sole discretion. This promotion may not be combined with the Unlimited Reacquisition Bundle Offer.

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A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

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Second Revenus Page 12.5

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EFFECTIVE: January 9, 2005

TELECOMMUNICATIONS, INC III.ORIDA SSSLED: December 24, 2004 BY: Joseph P. Lacher, President FL Months, Florida

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A2. GENERAL REGULATIONS

A2.10 Special Promotions (Cont'd)

A2.10.2 Descriptions (Cont'd)

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February 10, 2004 Via Overnight Delivery



210 N. Fark Arc.

32789

P.O. Drawer 760 Winter Park, Fi 32790-0200

Tel: 407-740-8575 Fax: 407-740-0613

tani@taniac.com

Ms. Beth Salak Director of Competitive Markets Florida Public Service Commission 2540 Shumard Oak Boulevard

Tullahassee, Florida 12399-0870

RE: Tariff Revision for BellSouth Long Distance, Inc.

Dear Ms. Salak

Enclosed for filing is the original and three (3) copies of a tariff revision filed on behalf of BellSouth Long Distance, Inc. This filing eliminates the calling card requirement from BellSouth* Dollar and BellSouth* Dollar Value plans. The Company respectfully requests an effective date of February 12, 2004 for this revision.

The following pages are included in this filling:

Page
41" Revised Page 2 Updates Clack Sheet
13" Revised Page 3 Updates Check Sheet
1* Revised Page 157.14 Deletes calling card requirement from Bell South* Dollar plan
1" Revised Page 157.15 Deletes calling card requirement from Bell South* Dollar Value plan

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope provided for that purpose.

Any questions regarding this Illing may be directed to my attention at (407) 740-8575.

Sincerely,

Thomas M. Forte

Consultant to BellSouth Long Distance, Inc.

TMF mw Enclosure

Mario Soto - BellSouth

Robin Taylor - BellSouth

Nancy Sizes - BST

file: BellSouth - FL

ms: FLi0404

SECTION 4.0 - RATES AND CHARGES, (CONT'D.)

4.2 Residential Service Offerings, (Cont'd.)

4.2.36 BellSouth Dollar Plan

The BellSouth* Dollar plan is a direct disled outhound long distance service offered to residential Customers from switched access lines. Service is offered on a flat rate basis, twenty-four hours per day, seven days per week. Customers must dial I plus the area code, if applicable, and the terminating number to complete a call utilizing this service.

(D) (D)

All calls are billed in one (1) minute increments after an initial period, for billing purposes, of one (1) minute. This service is only offered in conjunction with the corresponding interstate BellSouth* Dollar plan. This service is not offered on an initial.ATA only basis.

(A) Rates and Charges

(1) Monthly Recurring Charge

Monthly Charge (per account): * \$1.00

(2) Per Minute Rate

Per Minute Charge: \$0.1000

* This charge is the same as the Monthly Recurring Charge identified in the Company's Interstate Residential Services Pricing and Service Guide. Only one monthly recurring charge will apply when both interstate and intrastate service is provided to the Customer.

Issued February 11: 2004

Effective: February 12, 2004

SECTION 4.0 - RATES AND CHARGES, (CONTID.)

4.2 Residential Service Offerings, (Cont'd.)

4.2.37 BellSouth Dollar Value Plan

The BellSouth* Dollar Value plan is a direct dialed outbound long distance service offered to residential Customers from switched access lines. Service is offered on a flat rate basis, twenty-four hours per day, seven days per week. Customers must dial I plus the area code, if applicable, and the terminating number to complete a call utilizing this service.

Customers of this plan must subscribe to BellSouth* Complete Choice* plan, BellSouth* Area Plus* plan or Flat Rate Residential Individual lines. Customers who subscribe to Flat Rate Residential Individual lines must also subscribe to at least two Associated Services listed in Section 3.15 of this tariff. These plans and services are provided by the Company's affiliated incumbent local exchange entity. The Customer must also receive billing for each of these services from the Company's affiliated incumbent local exchange entity. Customers who no longer meet the eligibility requirements identified above will be transferred to the BellSouth* Dollar plan without further notice.

All calls are billed in one (1) minute increments after an initial period, for billing purposes, of one (1) minute. This service is only offered in conjunction with the corresponding interstate BellSouth* Dollar Value plan. This service is not offered on an intraLATA only basis.

(A) Rates and Charges

(1) Monthly Recurring Charge

Monthly Charge (per account): *

\$1.00

(2) Per Minute Rate

Per Minute Charge:

50.1000

* This charge is the same as the Monthly Recurring Charge identified in the Company's Interstate Residential Services Pricing and Service Guide. Only one monthly recurring charge will apply when both interstate and intrastate service is provided to the Customer.

Issued: February 11, 2004

Effective: February 12, 2004

(D)

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA
18SUED: December 24, 2003
BY: Joseph P. Lacher, Fresident -FL.
Mianni, Florida

A3.4 Flat Rate Service (Cont'd)

A13.19

Caller ID-Debuse, Call Return

GENERAL SUBSCRIDER SPRVNET TARIF.

Second Revised Page 26.1 Caucada Fina Revised Page 26.1

EFFECTIVE: January 9, 2004

(6)

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(30)

A3. BASIC LOCAL EXCHANGE SERVICE

A3.4.5 Optional Payment Plans for Multi-Line Flat Rate Service (Obsoleted, See Section A103) A3.4.6 PreferredPack Plan 049 A. Discription of Service 1. The PreferratPack plan provides the features services specified following and a flat rate access line with Touch-Tons On capebility. 2. The rate specified betoix catalox a residence subscriber to universed calling to all exchange across lines within the subscriber's local calling area as defined in A33.1. of this Tariff. The rate specified been also catalon a replement subscriber to unforcing use of the features services specified following (24) from the listed sections of the Text? Call Wairing Deluze, Three-Way Calling, Call Forwarding Busy Line, Call Forwarding Doe't Answer A13.9 00 (with or without Ring Countel), Son 98 Acress

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GENERAL SUBSCRIBER SERVICE TARRET

Thertocula Revised Page 24 Cancels Twelfth Revised Page 24

EFFECTIVE: February 15, 2005

BELLSOATH
TELECOMMUNICATIONS, INC.
FLORIDA
ISSUED: January 31, 2005
BY: Joseph P. Lacher, President -FL

Misoni, Florida

A3. BASIC LOCAL EXCHANGE SERVICE

A3.4 Flat Rate Service (Cont'd)

A3.4.2 Monthly Rates (Cont'd)

- B. Auxiliary Line Service (Inward Service) (Confd)
 - The antiliary line is to be used for one way (invased to the subscriber) service only.
 - 4. Auxiliary line service may or may not be arranged for colory, harring or similar service which allows completion of an incoming call from a first that is called but is in use, by means of an arrangement of central office equipment on a full time basis.
 - 5. Attributy line service is furnished at a rate for each line equal to the rate applicable for business individual line flat rate service for that exchange. Where the lines are arranged for rectary, having or similar service, the rotary charge will apply as specified in A3.6.
 - s. Rates
 - (i) Rate Groups 1-6

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- R. Mobile Service Exchange Charp
 - 1. Sec Section A17. for Rates
- F. Outpoing Only Service
 - I. Set ALD for regulations and rates.

A3.4.3 Complete Choice Service

A. General

- Complete Chaice service provides the features specified following in conjunction with a flat sate access line. The access line includes Touch-Tone capability.
- 2. The rate specified bords contries a residence exhaustion to account all cardways access lines in the subscriber's local calling area or defined in AJJ I of this Twiff.
- The rate specified havein also catalles a residence subsculor to unimated use of the services/features specified in the following sections of this Tarriff:

그리고요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요요	· ·
A13.19 TouchStar Services excluding Calling Number Delivery Blocking Permanent	•
All 20 Committed Code Resistant	
ALX Replacement	
AULIT Masse Westig Extraction	
AID.10 Obsoles Canva Culting Services	
A12.16.2.A Call Hold and Call Pickup only (PCS limitations do not apply)	

A subscriber may select an unlimited member of companion services or features from the sections lipsed above. All rules, regulations said innuminous specified in the sections listed (except as indicated above) apply to the suspective services/features to passed as part of this service. Service charges specified in Section AA of this Twiff do not apply for transactions involving only additions, deletions or charges to the services features suspensed as pair of this service.

Note 1: The Multi-line Exchange Access Line rate applies per line to subscribers with more than one exchange source line.

All RefSouth marks occurred herein and as an limb in the malescents and service marks anchors of the Thriff are executivy Bell South irradientual Property.

(7)

GENERAL SUBSCRIBER SERVICE TARJEE

Nindi Revised Page 25
Cancels Eighth Revised Page 25

EFFECTIVE: March 28, 2003

BELLSOUTH
TELECOMMUNICATIONS, INC.
FLORIDA
ISSUED: March 13, 2009

1350 cur marce 13, and 3Y: Joseph P. Lacher, President FL

Miami, Florida

A3. BASIC LOCAL EXCHANGE SERVICE

A3.4 Flat Rate Service (Cont'd)

A3.4.3 Complete Choice® Service (Cont'd)

A. General (Confd)

- 4. Resistance constances may substrain to the Two-Line Plan or the Three-Line Plan for Complete Chaine® service. Both plans offer hunting as specified in A1.6 at no additional charge in addition to the features listed in 3. preceding. All services/features specified as available with Complete Chaine® service are available with each line of a multi-line package. All lines in each multi-line package must be billed to the same account and located at the same premises.
- Service charges specified in Section A4. of this Teriff do not apply for a conversion of existing service to/from Complete Choice service.
- 6. Existing customers of Complete Choice* service can not take advantage of operate promotions for Complete Choice* service or Anna Plans* service with the Complete Choice* option or say of the services (between specified in 3, percenting unless specifically allowed by the terms of the special promotion.

B. Rates and Charges

- 1. The following monthly rates apply for Complete Choice® service.
 - a. Individual line service
 - (I) Residence

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				Rete	Rate .	USOC	
(a) Per line				- 34	533 40	NA	
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				14.50			
					83.95	T.MI.S	
(c) Per Three							

ASAA Area Plus Service

A. General

Area Pine® service provides residence subscribers a fint rate acress line with unlimited calling to all access lines within
the serving exchange, the additional exchanges in the associated Extended Area Service (EAS) and Extended Calling
Service (ECS) categorics as aspecified in A3.3.1 of this Turiff, and all other exchanges in the subscriber's LATA. The
LATA for each exchange is audicated in A3.3.1 and the exchanges in each LATA are listed in A3.3.2. The access line
includes Touch-Tone capability.

^{*} Registered Service Mark of BoltSouth Intellectual Property Concentrate